

1 TESLA, INC.
2 Aaron Langberg (SBN 284975)
3 31353 Huntwood Avenue
4 Hayward, CA 94544
5 Telephone: (510) 828-8959
6 alangberg@tesla.com

FROST BROWN TODD LLP
Aaron M. Bernay, *pro hac vice*
Ryan M. Goellner, *pro hac vice*
3300 Great American Tower
301 East Fourth Street
Cincinnati, Ohio 45202
Tel: (513) 651-6800
Fax: (513) 651-6981
ABernay@fbtlaw.com
Rgoellner@fbtlaw.com

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8 *Attorneys for Defendant*
9 *Tesla, Inc.*

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 SASA MASLIC, et al.,
16 Plaintiffs,
17 vs.
18 ISM VUZEM D.O.O., et al.,
19 Defendants.
20

Case No. 5:21-cv-02556-BLF-SVK

**SUPPLEMENTAL STATEMENT OF
DEFENDANT TESLA, INC.
FOLLOWING APRIL 23, 2024
HEARING ON JOINT DISCOVERY
STATEMENT**

Re: Dkt. Nos. 129 & 131

1 Defendant Tesla, Inc. responds to the Court's April 23, 2024 Order (Dkt. No. 129) and to
2 the April 25, 2023 Order/Clerk's Notice (Dkt. No. 131) as follows:

3 **1.a. Lenel Database**

4 As stated in Tesla's first report on this subject (Dkt. No. 130), undersigned counsel had
5 contacted a regional manager for Lenel via email and telephone in search of assistance with
6 accessing the database. On Friday, April 26, Tesla received confirmation that the regional manager
7 had received counsel's inquiries and a promise that other Lenel personnel would follow up with
8 counsel for Tesla with more details regarding access to the database in question. Later on Friday
9 afternoon, the undersigned received an email from Steven L. Partridge, the Vice President of Sales
10 for the United States and Canada for Lenel. Mr. Partridge confirmed that the Tesla database in
11 question is not stored by Lenel, nor does Lenel have remote access to the database. Mr. Partridge
12 further indicated that Northland Controls, Lenel's "integrator-partner" that services Tesla's
13 account, provides services for the relevant system or program through which the Tesla database is
14 stored. Mr. Partridge also offered to connect the undersigned with Northland Controls.
15 Undersigned counsel responded to Mr. Partridge's email within a few hours of its receipt on April
16 26, seeking a contact at Northland Controls for assistance with accessing the database, and it is
17 hoped that Northland Controls may have software or another system that can facilitate Tesla's
18 access to the database in question. Undersigned counsel then followed up with Mr. Partridge and
19 other Lenel personnel on the morning of April 29, but has not received a further response from
20 Lenel or the promised contact with Northland Controls. On April 29, undersigned counsel called
21 and emailed Northland Controls' general customer service contacts but was unable to reach an
22 agent for assistance or receive a response as of the filing of this report.

23 Tesla appreciates the patience of both the Court and opposing counsel as it works to obtain
24 access to the database formerly believed to be controlled by Lenel and now believed to be accessed
25 through Northland Controls. In light of the foregoing, Tesla respectfully proposes that it continue
26 to contact all available persons at Lenel and Northland Controls and provide a further update to
27 the Court by 2 p.m. P.D.T. on May 1, 2024.

1 Dated: April 29, 2024

Respectfully submitted,

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3 By: /s/ Aaron M. Bernay

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16 Tel: (513) 651-6800
17 Fax: (513) 651-6981
18 abernay@fbtlaw.com
19 rgoellner@fbtlaw.com

20 *Attorneys for Defendant Tesla, Inc.*

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CERTIFICATE OF SERVICE

Pursuant to Civil L.R. 5-5(a), I, Aaron M. Bernay, hereby certify that the foregoing has been filed with the Court via the CM/ECF system, which will send notice of this filing to all registered users in this case.

21 Dated: April 29, 2024

/s/ Aaron M. Bernay

22 Aaron M. Bernay
23 Counsel for Defendant Tesla, Inc.

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